

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re:	)	Case No. 18 B 01940
	)	
BRADLEY J. PINZER, and	)	Chapter 13
ERIKA PINZER,	)	
Debtors.	)	Hon. Carol A. Doyle

**AGREED ORDER CONDITIONING AUTOMATIC STAY**

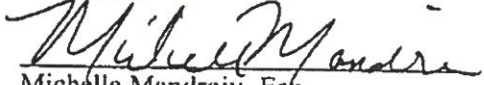
This cause coming before the Court upon the Motion of SANTANDER CONSUMER USA INC. ("Santander") to Modify Automatic Stay, due notice having been given, the parties being in agreement, and the Court being fully advised in the premises;


IT IS HEREBY ORDERED:

1. Santander's Motion to Modify Automatic Stay is granted, in part, and withdrawn, in part, subject to the conditions of this Order;
2. That if not already provided, Bradley J. Pinzer and Erika Pinzer ("Debtors"), agree to provide Santander with proof of insurance for the 2016 Volkswagen CC motor vehicle bearing a Vehicle Identification Number of WVWBP7AN7GE510639 (the "Vehicle"), which is the subject of its Motion to Modify Automatic stay, *instantly*;
3. That Debtors agree to at all times maintain valid insurance on the Vehicle wherein Santander is listed as the lienholder/loss payee and agree to provide Santander with proof of same without demand;
4. That in the event Debtors convert this case to one under Chapter 7, or fail to tender payment to Santander pursuant to the Chapter 13 Plan and Retail Installment Contract with Santander, to the extent that said non-payment results in a default in payment obligations thereunder to Santander of two (2) or more monthly payments, or otherwise fail to comply with any of the other terms or conditions of this Order, such failure shall constitute a default by Debtors of the provisions of this Order as to Santander, which shall have the right to take possession of and foreclose its security interest in the Vehicle as provided by Illinois law and statute without having to seek leave of Court to modify the automatic stay in these proceedings if such default is not cured within fourteen (14) days of notice to Debtors and counsel by Santander;

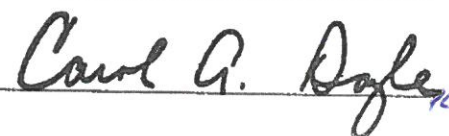
5. If applicable, upon modification of the automatic stay as outline above, and after Santander has foreclosed its security interest in the Vehicle, Santander shall be allowed an amended, unsecured claim for any deficiency balance remaining.

AGREED:

  
Michelle Mandrou, Esq.  
On behalf of Debtors, Bradley J. Pinzer  
and Erika Pinzer

  
Cari A. Kauffman, Esq.  
On behalf of Santander Consumer USA Inc.

ENTER:

8/21/18  
Judge: 

**Prepared by counsel for Movant:**

Cari A. Kauffman (Ill. #6301778)  
Sorman & Frankel, Ltd.  
180 North LaSalle Street, Suite 2700  
Chicago, Illinois 60601  
(312) 332-3535  
(312) 332-3545 (facsimile)